IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

JONATHAN RIVERA-PIEROLA,)
Plaintiff,)
v.) Case No.: CIV-21-616-PRW
BOARD OF REGENTS FOR THE OKLAHOMA AGRICULTURAL AND MECHANICAL COLLEGES; STATE OF OKLAHOMA ex rel. OKLAHOMA STATE UNIVERSITY; and ST. MATTHEWS UNIVERSITY,)))))
Defendants.)

MOTION FOR ADMISSION PRO HAC VICE FOR JENNIFER MCCOY

Jeremy Tubb hereby applies, pursuant to LCvR 83.3(b), for the Court's permission for Jennifer McCoy to appear as counsel *pro hac vice* for Defendant, St. Matthew's University in this case.

- 1. I am an active member in good standing of the bar of the Supreme Court of the State of Oklahoma (State Bar No. 16739). I am also admitted to practice in this Court, the United States District Courts of the Eastern and Northern Districts of Oklahoma and the United States Court of Appeals for the Tenth Judicial Circuit. I submit this request for the Court's permission that Jennifer McCoy of Locke Lord LLP may appear as counsel *pro hac vice* for Defendant, St. Matthew's University in this action.
- 2. Ms. McCoy is an active member in good standing of the bar of the State of Texas (State Bar No. 24089805) and is an active member in good standing in the highest

court in Texas. She is admitted to practice before the state courts of Texas, the U.S. district Court for the Northern District of Texas, the U.S. District Court for the Eastern District of Texas, and the U.S. District Court for the Southern District of Texas. (See attached Exhibit 1), Request for Admission *Pro Hac Vice*.) She is counsel for the Defendant, St. Matthew's University. Her business address is 2200 Ross Avenue, Suite 2800, Dallas, Texas 75201, her telephone number is (214) 740-8000, and her fax number is (214) 740-8800.

- 3. Ms. McCoy has never been denied admission, disbarred, suspended from practice, reprimanded, denied "in good standing" status, or otherwise disciplined by any court, bar association, grievance committee, or administrative body.
- 4. No proceeding that could lead to any such disciplinary action has been instituted against Ms. McCoy.
- 5. Ms. McCoy is familiar with the Federal Rules of Evidence, the Federal Rules of Civil Procedure and the local rules of this Court.

I request the Court's permission for Ms. McCoy to be allowed to appear as counsel *pro hac vice* to represent St. Matthew's University with me on this case.

I declare under penalty of perjury under the laws of the State of Oklahoma that the foregoing is true and correct.

DATED this 5th day of October, 2021.

/s/Jeremy Tubb

Jeremy Tubb, OBA #16739

FULLER TUBB BICKFORD WARMINGTON & PANACH, PLLC

201 Robert S. Kerr Avenue, Suite 1000 Oklahoma City, Oklahoma 73102 (405) 235-2575 (Telephone) (405) 232-8384 (Fax) jeremy.tubb@fullertubb.com ATTORNEY FOR DEFENDANT ST. MATTHEW'S UNIVERSITY

CERTIFICATE OF SERVICE

I hereby certify that on October 5th, 2021, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

R. Jack Freeman, OBA #3128 Levinson, Smith & Huffman, PC 1861 East 71st Street Tulsa, OK 74136 918-492-4433 jack@lsh-law-firm.com

Jason J. Bach, Esq., Nevada Bar No. 7984 The Bach Law Firm, LLC (Pro Hac Vice) 7881 W. Charleston Blvd., Suite 165 Las Vegas, Nevada 89117 702-925-8787 jbach@bachlawfirm.com

ATTORNEYS FOR PLAINTIFF

/s/ Jeremy Tubb Jeremy Tubb